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1 Defendant may call all persons named or referred to in the State's disclosure with respect  
2 to each of the designated defenses; the defendant himself may testify to each of the designated  
3 defenses. Additionally, defendant may call:

4 NAME ADDRESS TESTIFY AS TO DEFENSE NO.

5 1) Names disclosed when known.  
6

7 **III. Request For Full And Prompt Disclosure**

8 To date, the State has either failed to provide disclosure or has only disclosed standard  
9 police reports containing limited information consisting primarily of the opinions of the officers  
10 involved in this case. Until the State makes full disclosure and until interviews can be conducted  
11 with the witnesses in this case, the defense is unable to make its full disclosure. The defendant  
12 therefore requests pursuant to Rule 15 A.R.Cr.P. 1) complete disclosure of all witness  
13 statements; 2) all Brady material; 3) all 404(b) prior bad act evidence; 4) 609 character evidence  
14 for all of the State's witnesses; and 5) interviews with all State witnesses. Prompt and good faith  
15 compliance with this request will serve to keep this case on track and help to guarantee a prompt  
16 resolution of this matter.

17 **IV. EXHIBITS**

18 Defendant may use papers, documents, photographs, charts, diagrams, test results and  
19 other tangible objects at trial. Inspection may be arranged upon reasonable notice to defense  
20 counsel.

21 RESPECTFULLY SUBMITTED this 27 October 2017

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23  
24 Adam K. Zickerman  
Attorney for the Defendant  
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